

***United States District Court***

**DISTRICT OF NEW HAMPSHIRE**

**United States of America**

**v.**

**Ian Freeman**

**CASE NUMBER: 1:21-cr-00041-JL-01**

**MOTION FOR REMOVAL OF TRACKING DEVICE**

NOW COMES the Defendant, Ian Freeman, by and through counsel, and respectfully requests that this Honorable Court alter his present bail conditions by allowance of the G.P.S. tracking device currently attached to his ankle.

As grounds he states as follows:

1. He has now been on Pre-Trial release for approximately one year.
2. No major problems have been noted by U.S. Probation over that period of time.
3. He does not present as an individual that will fail to appear
4. It is the Defendant's understanding that U.S. Probation has no objection to the removal of the device.
5. There is no good reason for the continued utilization of the device

WHEREFORE, the Defendant prays that this Honorable Court order that the G.P.S./Tracking Device be removed for reasons set forth in this pleading and for any other reason that may arise at a Hearing on this matter.

Respectfully Submitted,



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Mark L. Sisti  
Sisti Law Offices  
387 Dover Rd.,  
Chichester, NH 03258  
603-224-4220

**May 13, 2022**

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**Date**



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**Signature**

Mark L. Sisti

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**Print Name**

387 Dover Road

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**Address**

Chichester, NH 03258

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**City**

**State**

**Zip Code**

(603) 224-4220

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**Phone Number**

## CERTIFICATION

I hereby certify that a copy of this appearance was forwarded to Assistant United States Attorneys Seth R. Aframe and Georgiana L. MacDonald, electronically through EFC on May 13, 2022.

**May 13, 2022**

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**Date**



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**Signature**

Mark L. Sisti

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**Print Name**